

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

CONSUMER FINANCIAL PROTECTION))	
BUREAU, et al.,)	
)	
Plaintiffs,)	CASE NO. 24-CV-40-EAW-MJR
)	
v.)	
)	
STRATFS, LLC (f/k/a STRATEGIC FINANCIAL))	
SOLUTIONS, LLC), et al.)	
)	
Defendants, and)	
)	
DANIEL BLUMKIN, et al.)	
)	
Relief Defendants.)	

**RESPONSE IN OPPOSITION TO PLAINTIFFS' MOTION TO EXTEND THE
TEMPORARY RESTRAINING ORDER AND RELIEF DEFENDANTS' MOTION TO
DISSOLVE THE ASSET FREEZE**

Individual Defendant Ryan Sasson and Relief Defendants Daniel Blumkin and Albert Ian Behar (Blumkin and Behar together as, “Relief Defendants”) submit the following response to Plaintiffs’ Motion to Extend the Temporary Restraining Order (“TRO”), ECF No. 57. For the reasons stated in the Corporate Defendants’¹ Motion to Dissolve the TRO and Memorandum in

¹ The Corporate Defendants’ are Defendants StratFS, LLC (f/k/a Strategic Financial Solutions, LLC), Strategic Client Support, LLC, Strategic CS, LLC, Strategic FS Buffalo, LLC, Strategic NYC, LLC, BCF Capital, LLC, T Fin, LLC, Strategic Consulting, LLC, Versara Lending, LLC, Strategic Family, Inc., Anchor Client Services, LLC, Bedrock Client Services, LLC, Boulder Client Services, LLC, Canyon Client Services, LLC, Carolina Client Services, LLC, Great Lakes Client Services, LLC, Guidestone Client Services, LLC, Harbor Client Services, LLC, Heartland Client Services, LLC, Monarch Client Services, LLC, Newport Client Services, LLC, Northstar Client Services, LLC, Option 1 Client Services, LLC, Pioneer Client Servicing, LLC, Rockwell Client Services, LLC, Royal Client Services, LLC, Stonepoint Client Services, LLC, Summit Client Services, LLC, and Whitestone Client Services, LLC.

Support, ECF Nos. 36 and 36-1 – which Sasson and the Relief Defendants join – Sasson and the Relief Defendants oppose Plaintiffs’ Motion to Extend the TRO.

The undersigned also recognizes that the Court expressed it would not take the Motion to Dissolve under consideration until the preliminary injunction hearing.

Dated: January 23, 2024

/s/ Ronald S. Safer

Ronald S. Safer (*pro hac vice*)

Rodney Perry (*pro hac vice*)

Matthew Kennison (*pro hac vice*)

Maegan McAdam

RILEY SAFER HOLMES & CANCELILA LLP

70 W. Madison Street, Suite 2900

Chicago, Illinois 60602

Tel: (312) 471-8700

rsafer@rshc-law.com

rperry@rshc-law.com

mkennisiain@rshc-law.com

mmcadam@rshc-law.com

*Attorneys for Individual Defendant Ryan
Sasson and Relief Defendants Daniel
Blumkin and Ian Behar*